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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DEANDRE MORROW,

Plaintiff,

v.

CLARK COUNTY; OFFICER THOMPSON,
ID #606,

Defendants.

CASE NO.: 2:20-cv-02264-JAD-EJY

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

**(SUBMITTED IN COMPLIANCE WITH
LR 26-1(b))**

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure and Local Rule 26-1, Plaintiff DEANDRE MORROW ("Plaintiff"), pro se, and Defendant OFFICER THOMPSON ("Defendant"), by and through his attorneys of record, submit the following Stipulated Discovery Plan and Scheduling Order:

1. Meeting. Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1, a telephonic conference was held on March 29, 2022, and was attended by Plaintiff and Betty J. Foley for Defendant.

2. Discovery Disclosures. The parties agree, pursuant to Local Rule 26-1, that the parties will exchange their respective initial disclosures by **Tuesday, April 12, 2022**, which is within 14 days of the date of the initial Rule 26(f) conference, and that there should be no changes to the initial disclosure requirements under Fed. R. Civ. P. 26(a)(1).

3. Subject of Discovery. The parties will conduct discovery on the claims and defenses concerning the action.

1 **4. Discovery Plan.** The parties propose the following discovery plan:

2 **A. Discovery Cut-Off Date:**

3 The parties have met and agreed that the standard discovery time period should apply to
4 this case. Accordingly, the parties request that discovery shall close on **Monday, August 8,**
5 **2022**, which is one hundred and eighty (180) days from the date that Defendant first appeared in
6 the case, February 9, 2022.

7 **B. Amending the Pleadings and Adding Parties:** In accordance with LR
8 26-1(b)(2), the deadline to file motions to amend the pleadings or add parties shall be **Tuesday,**
9 **May 2, 2022**, ninety (90) days prior to the close of discovery.

10 **C. Expert Disclosures:** In accordance with Fed. R. Civ. P. 26(a)(2) and LR
11 26-1(b)(3), disclosures identifying initial experts shall be made no later than **Thursday, June 9,**
12 **2022**, sixty (60) days prior to the close of discovery. Disclosures identifying rebuttal experts
13 shall be made no later than **Friday, July 8, 2022**, thirty (30) days after the initial expert
14 disclosures deadline.

15 **D. Dispositive Motions:** In accordance with LR 26-1(b)(4), the parties shall
16 have until **Wednesday, September 7, 2022**, to file dispositive motions, thirty (30) days after the
17 close of discovery.

18 **E. Pre-Trial Order:** In accordance with LR 26-1(b)(5), the Joint Pretrial
19 order shall be filed by **Friday, October 7, 2022**, which is thirty (30) days after the dispositive
20 motion deadline. In the event that dispositive motions are filed, the date for filing the joint
21 pretrial order shall be suspended until thirty (30) days after the Court issues its decision on any
22 dispositive motions or further order of the Court. In accordance with LR 26-1(b)(6), the
23 disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections shall be included in the final
24 pretrial order, and must be filed at least thirty (30) days prior to trial in accordance with Fed. R.
25 Civ. P. 26(a)(3)(B).

26 **F. Modifications of the Discovery Plan and Scheduling Order:** In
27 accordance with LR 26-3, any modifications or extensions of the Discovery Plan and Scheduling
28 Order shall be supported by a showing of good cause for the extension. Any stipulation or

1 motion must be made at least twenty-one (21) days prior to the expiration of any extension
2 thereof that may have been approved by the Court, or at least twenty-one (21) days prior to the
3 expiration of the subject deadline.

4 **5. Certifications.** Pursuant to LR 26-1(b)(7-9), the parties certify as follows:

5 **A. Alternative Dispute Resolution.**

6 The parties have met and conferred about the possibility of using alternative dispute
7 resolution and are agreeable to engaging in settlement discussions or mediation once some initial
8 discovery has been completed.

9 **B. Alternative Forms of Case Disposition.**

10 The parties hereby certify that they have considered consent to trial by a magistrate judge
11 under 28 U.S.C. §636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General
12 Order 2013-01). The parties do not so consent at this time.

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C. Electronic Evidence.

The parties certify they have discussed whether they intend to present evidence in electronic format to jurors for the purposes of jury deliberations. Discussions between the parties will be ongoing as the trial date approaches and any electronic evidence will be presented in a format compatible with the Court's electronic jury evidence display system.

DATED: March 29, 2022.

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CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL

PLAINTIFF DEANDRE MORROW

By: /s/ Betty Foley
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By: Deandre Morrow
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ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: March 29, 2022